

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

CHAPTER 11

**Colin Robert Crossman and
Deanna Marie Crossman,**

CASE NO. 18-04668-5-DMW

Debtors.

**APPLICATION BY DEBTORS FOR AUTHORITY TO
EMPLOY AND APPOINT ATTORNEYS**

NOW COME, Colin Robert Crossman and Deanna Marie Crossman, Debtors in the above-referenced case, pursuant to Bankruptcy Rule 2014, and respectfully represent as follows:

1. Debtors filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code on September 20, 2018.

2. Debtors wish to employ William P. Janvier and the Janvier Law Firm, PLLC ("Firm"). William P. Janvier is duly admitted to practice in this Court.

3. Debtors have selected William P. Janvier for the reason that he has experience in Chapter 11 reorganization matters and Debtors believe that William P. Janvier and the Firm are well qualified to represent them in this proceeding.

4. The professional services William P. Janvier and the Firm are to render are as follows:

- a. To prepare on behalf of Debtor necessary petitions, applications, complaints, answers, orders, reports, motions, notices, plan or reorganization, disclosure statement and other papers necessary to Debtor's reorganization case.
- b. To perform all necessary legal services in connection with the Debtor's reorganization, including Court appearances, research, opinions and consultations on reorganization options, direction and strategy; and
- c. To perform all other legal services for Debtor which may be necessary in this Chapter 11 case.

5. It is necessary for Debtors to employ an attorney in this Chapter 11 case for the professional services described in paragraph 4 above.

6. Debtors desire to employ William P. Janvier and the Firm on an hourly basis for work performed. The terms of the employment of William P. Janvier and the Firm are contained in the attached Affidavit of Disinterestedness.

7. Except as disclosed in the attached affidavit, William P. Janvier and the Firm represent no interest adverse to Debtor or the estate in the matters upon which they are to be engaged for Debtors and said employment would be in the best interest of the estate.

WHEREFORE, Debtors pray that they be authorized to employ and appoint William P. Janvier and the Janvier Law Firm, PLLC as their attorneys on the basis set out herein, and that they have such other and further relief as is just.

This the 2nd day of October, 2018.



Colin Robert Crossman



Deanna Marie Crossman

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

CHAPTER 11

**Colin Robert Crossman and
Deanna Marie Crossman,**

CASE NO. 18-04668-5-DMW

Debtors.

**AFFIDAVIT OF DISINTERESTEDNESS AND IN SUPPORT OF APPLICATION BY
DEBTORS FOR AUTHORITY TO EMPLOY AND APPOINT ATTORNEY**

STATE OF NORTH CAROLINA
COUNTY OF WAKE

William P. Janvier, of Janvier Law Firm, PLLC ("Firm"), being first and duly sworn, avers and says that:

1. He is an attorney duly licensed to practice law in the State of North Carolina and in this Court.

2. He practices law with Janvier Law Firm, PLLC, located at 311 E. Edenton Street, Raleigh, NC 27601.

3. Neither William P. Janvier nor the Firm has any business connections with the above-named Debtors, their creditors, or any other party in interest, or its respective attorneys or accountants, except for representation in this case and as disclosed below.

4. Neither William P. Janvier nor the Firm represents or holds any adverse interest to the Debtor or the estate in the matters upon which they are to be engaged, except that the Firm is owed \$425.00 for services incurred directly related to the filing of this case, which the Firm will include in its first fee application.

5. William P. Janvier and the Firm have entered into an agreement with the Debtor regarding fees which provides that:

Subject to Court approval, William P. Janvier and William E. Brewer will render services at the rate of \$450.00 per hour; Samantha Y. Moore and William F. Braziel III will render services at the rate of \$325.00 per hour; Erin Duffy and Kathleen O'Malley will render services at the rate of \$250.00 per hour; and the firm's law clerks and paralegals will render services at the rate of \$110.00 to \$160.00 per hour. Hourly rates may be subject to increase on January 1st of each year.

On September 12, 2018, Janvier Law Firm, PLLC received a retainer of \$10,000.00. A payment was made on Debtors' invoice for services and expenses in the amount \$3,868.00 from the pre-petition retainer.

This the 2nd day of October, 2018.

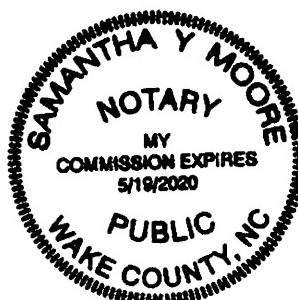


William P. Janvier

Sworn to and subscribed
before me this the 2 day of October, 2018.

Samantha Y. Moore
Notary Public

My Commission Expires: 5/19/2020



CERTIFICATE OF SERVICE

I, William P. Janvier, do hereby certify that the foregoing APPLICATION BY DEBTORS FOR AUTHORITY TO EMPLOY AND APPOINT ATTORNEYS and AFFIDAVIT OF DISINTERESTEDNESS AND IN SUPPORT OF APPLICATION BY DEBTOR FOR AUTHORITY TO EMPLOY AND APPOINT ATTORNEY has been served upon each of the parties listed below by placing copies of the same in the United States mail, postage prepaid or by electronic mail as indicated below.

Marjorie K. Lynch (Via CM/ECF)
Bankruptcy Administrator, EDNC
434 Fayetteville Street, Suite 640
Raleigh, NC 27601

Colin Crossman (Via CM/ECF)
301 S. Academy Street
Cary, NC 27511

Deanna Crossman (Via CM/ECF)
301 S. Academy Street
Cary, NC 27511

This the 3rd day of October, 2018.

s/ Kathleen O'Malley
Kathleen O'Malley
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